

1 Diane L. McGimsey (SBN 234953)
(mcgimseyd@sullcrom.com)
2 Jordan L. Gary (SBN 351074)
(garyj@sullcrom.com)
3 Avalee M. Statner (SBN 318867)
(statnera@sullcrom.com)
4 Rose G. Garber (SBN 339196)
(garberr@sullcrom.com)
5 SULLIVAN & CROMWELL LLP
1888 Century Park East, Suite 2100
6 Los Angeles, California 90067
Telephone: (310) 712-6600
7 Facsimile: (310) 712-8800

8 *Counsel for Defendants Wells Fargo &*
Company and Wells Fargo Bank, N.A.
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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
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15
16 SHELLEY FREEMAN,
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Plaintiff,
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v.
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WELLS FARGO & COMPANY, WELLS
20 FARGO BANK, N.A.,
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Defendants.
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Case No. 4:23-cv-00476-DMR

**STIPULATION AND ORDER (AS
MODIFIED) RE: REQUEST TO MODIFY
CASE SCHEDULE**

The Hon. Donna M. Ryu

1 The undersigned counsel for Plaintiff Shelley Freeman (“Plaintiff”) and Defendants Wells Fargo
2 & Company and Wells Fargo Bank, N.A. (“Defendants,” and collectively with Plaintiff, the “Parties”) in
3 the above-captioned action hereby stipulate and agree as follows:

4 WHEREAS, on November 16, 2023, the Court entered a Case Management and Pretrial Order
5 for Jury Trial setting the current schedule (ECF No. 44);

6 WHEREAS, on May 14, 2024, Plaintiff served Plaintiff’s First Request for Production to
7 Defendants (“Plaintiff’s Requests”) containing 198 separate document requests;

8 WHEREAS, on July 15, 2024, Defendants served their responses and objections to Plaintiff’s
9 Requests;

10 WHEREAS, the Parties have had multiple meet and confer discussions regarding Plaintiff’s
11 Requests and the Parties are continuing to meet and confer concerning the requests to try to narrow any
12 outstanding disputes;

13 WHEREAS, Defendants will begin producing documents responsive to requests to which there
14 is no dispute in short order;

15 WHEREAS, on October 7, 2024, Defendants served their First Set of Requests for Production to
16 Plaintiff (“Defendants’ Requests”);

17 WHEREAS, Plaintiff’s responses and objections to Defendants’ Requests are due November 6,
18 2024;

19 WHEREAS, the Parties anticipate serving additional discovery in the near future and
20 commencing depositions as soon as reasonably possible;

21 WHEREAS, on October 11, 2024, the Court entered an order: (i) continuing the case
22 management conference set for October 16, 2024 to February 19, 2025; and (ii) directing the Parties to
23 file a stipulation and proposed order re: request to modify case schedule by October 16, 2024
24 (ECF No. 56); and

25 WHEREAS, for the reasons set forth in the Parties’ Joint Case Management Statement
26 (ECF No. 54), the Parties respectfully submit that good cause exists to amend the case schedule.

27 NOW, THEREFORE, the Parties hereby stipulate and agree to, and respectfully request that the
28 Court enter the following case schedule:

EVENT	CURRENT DATE	PROPOSED DATE
Deadline to Complete Non-Expert Discovery	November 1, 2024	March 21, 2025
Last Day for Dispositive Motions to be Heard	February 13, 2025	July 10, 2025
Deadline to Serve Opening Expert Reports	April 24, 2025	September 11, 2025
Deadline to Serve Rebuttal Expert Reports	May 15, 2025	October 2, 2025
Deadline to Complete Expert Discovery	May 29, 2025	October 16, 2025
Last day for <i>Daubert</i> Motions to be Heard	July 24, 2025	December 11, 2025
Deadline to Complete Private Mediation	July 31, 2025	December 18, 2025
Deadline to Meet and Confer re Joint Pretrial Conference Statement, Preparation and Exchange of Pretrial Materials, and Settlement	September 23, 2025	February 10, 2026 March 10, 2026
Deadline to File Joint Pretrial Statement and other Pretrial Materials	October 3, 2024	March 2, 2026 March 20, 2026
Deadline to Serve and File Certain Objections and Oppositions to Motions <i>in Limine</i>	October 13, 2025	March 12, 2026 March 30, 2026
Pretrial Conference	October 22, 2025	March 20, 2026 April 8, 2026
Trial	November 3, 2025	March 30, 2026 April 20, 2026

IT IS SO STIPULATED AND ORDERED (AS MODIFIED ON OCTOBER 21, 2024).

Dated: October 17, 2024

Respectfully submitted,

SULLIVAN & CROMWELL LLP

By: /s/ Diane L. McGimsey

Diane L. McGimsey (SBN 234953)

(mcgimseyd@sullcrom.com)

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(garyj@sullcrom.com)

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Los Angeles, California 90067

Telephone: (310) 712-6600

Facsimile: (310) 712-8800

*Counsel for Defendants Wells Fargo &
Company and Wells Fargo Bank, N.A.*

ALLRED, MAROKO & GOLDBERG

By: /s/ John S. West

Nathan Goldberg (SBN 61292)
John S. West (SBN 102034)
6300 Wilshire Boulevard, Suite 1500
Los Angeles, CA 90048
Telephone: (323) 653-6530
Facsimile: (323) 653-1660

Counsel for Plaintiff Shelley Freeman

Attestation Pursuant to Local Rule 5-1(i)(3)

Pursuant to Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

Dated: October 17, 2024

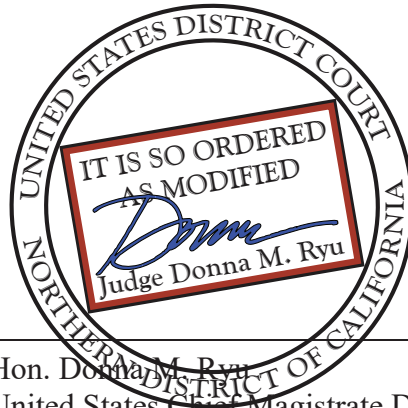
/s/ Diane L. McGimsey
Diane L. McGimsey

* * *

ORDER (AS MODIFIED)

PURSUANT TO THE STIPULATION, IT IS SO ORDERED AS MODIFIED.

Date: October 21, 2024



Hon. Donna M. Ryu
United States Chief Magistrate District Judge